

DALE L. ALLEN, JR., State Bar No. 145279  
dallen@aghwlaw.com  
AMEET D. PATEL, State Bar No. 343413  
apatel@aghwlaw.com  
ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP  
180 Montgomery Street, Suite 1200  
San Francisco, CA 94104  
Telephone: (415) 697-2000  
Facsimile: (415) 813-2045

Attorney for Defendant  
CITY OF REDDING, GARRETT MAXWELL, AND  
MATTHEW BRUCE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

VERONICA MCLEOD, individually and  
as successor in interest to decedent,  
DOLORES HERNANDEZ; AMADO  
HERNANADEZ; individually and as  
successor in interest to decedent,  
DOLORES HERNANDEZ; and YSIDRA  
REGALDO, individually,

Plaintiff,

v.

CITY OF REDDING; GARRETT  
MAXWELL, an individual; MATTHEW  
BRUCE, an individual; and DOES 2-10,  
inclusive,

Defendants.

Case No. 2:22-cv-00585-WBS-JDP

**DECLARATION OF AMEET PATEL  
IN SUPPORT OF JOINT  
STIPULATION AND REQUEST FOR ORDER  
TO MODIFY THE BRIEFING SCHEDULE  
FOR DEFENDANTS' FILED MOTION FOR  
SUMMARY JUDGMENT, OR IN THE  
ALTERNATIVE, SUMMARY  
ADJUDICATION AND PROPOSED ORDER**

Hon. WILLIAM B. SHUBB

Date: June 10, 2024  
Time: 1:30 p.m.  
Ctm: 5

Trial: September 10, 2024

I, AMEET D. PATEL, declare as follows:

1. I am an attorney at law and duly licensed to practice before all courts of the State of California and before the United States District Court for the Eastern District of California. I am an attorney with the law firm of Allen, Glaessner, Hazelwood & Werth, attorneys of record for Defendants CITY OF REDDING, GARRETT MAXWELL, and MATTHEW BRUCE ("Defendants").

///

2. I have personal knowledge of the following facts and could testify competently to them.

3. Defendants timely filed their Motion for Summary Judgment (or in the alternative, summary adjudication) pursuant to Rule 56 on April 24, 2024 (Dkt. No. 27 – “Motion for Summary Judgment”).

4. Pursuant to Local Rule 230(c) and (d) (and Rule (a)(1)(C)), Plaintiffs’ Opposition to Defendants’ Motion for Summary Judgment (Plaintiffs’ Opposition) is currently due on May 8, 2024, and Defendants’ Reply to Plaintiffs’ Opposition (“Defendants’ Reply”) is due on May 20, 2023.

5. I have a pre-planned vacation from May 7, 2024, to May 14, 2024, and other non-case related pending motions, depositions, and hearings over the next two to three weeks. Accordingly, I require additional time to prepare and file Defendants’ Reply and am requesting an extension of the current filing deadline of May 20, 2023, for Defendants’ Reply.

6. I met and conferred with Plaintiffs’ counsel (Hang D. Le) regarding my scheduling conflicts with the current briefing schedule for Defendant’s Motion for Summary Judgment. She and I have come to an agreement to extend the current filing deadline of May 20, 2023, for Defendants’ Reply, to allow additional time to file Defendants’ Reply. In exchange, Defendants agree to also allow Plaintiffs additional time to file Plaintiffs’ Opposition and to extend the current filing deadline of May 8, 2023, for Plaintiffs’.

7. Opposing counsel ultimately stipulated to extend the deadline to file Plaintiffs’ Opposition from **May 8, 2024**, to **May 13, 2024**, and to extend the deadline to file Defendants’ Reply from **May 20, 2024**, to **May 28, 2024**.

8. Lastly, the modifications suggested in the parties’ joint stipulation will ensure that neither party is prejudiced and that all parties have sufficient time to prepare and file their respective pleadings.

///

///

///

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed on May 3, 2024, at Dublin, California.

Respectfully submitted,

Dated: May 6, 2024

ALLEN, GLAESSNER,  
HAZELWOOD & WERTH, LLP

By: /s/Ameet D. Patel  
DALE L. ALLEN, JR.  
AMEET D. PATEL  
Attorneys for Defendants  
CITY OF REDDING, GARRETT  
MAXWELL, and MATTHEW BRUCE

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP  
180 Montgomery Street, Suite 1200  
San Francisco, California 94104